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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

THOMAS ROGER WHITE, JR., DAVIS
ESPINOZA, and CHRISTOPHER MILLS,
on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

LG ELECTRONICS, INC., LG
ELECTRONICS U.S.A., INC., SAMSUNG
ELECTRONICS CO., LTD., SAMSUNG
ELECTRONICS AMERICA, INC., SONY
CORPORATION, and SONY
ELECTRONICS CORPORATION, and John
and Jane Does (1-Unlimited) and ABC
Corporation (1-Unlimited),

Defendants.

Civil Action No. 17-01775 (MCA) (SCM)

Document electronically filed

**DECLARATION OF
MICHAEL R. MCDONALD, ESQ. IN
SUPPORT OF APPLICATION FOR
ADMISSION *PRO HAC VICE* OF
ERIC C. BOSSET, ESQ.,
SIMON J. FRANKEL, ESQ. AND
MEGAN L. RODGERS, ESQ.**

I, **MICHAEL R. MCDONALD**, of full age, declare, under penalty of perjury, as follows:

1. I am a Director of Gibbons P.C., and I submit this declaration to the Court in support of Defendant Samsung Electronics America, Inc. (“SEA”)’s application for an Order granting Eric C. Bosset, Esq., Simon J. Frankel, Esq. and Megan L. Rodgers, Esq. admission *pro hac vice* in this matter pursuant to Local Civil Rule 101.1(c). I am personally familiar with the facts set forth in this Declaration.

2. I am a member in good standing of the bars of the State of New Jersey, the Commonwealth of Pennsylvania, the United States District Court for the District of New Jersey, and the United States Court of Appeals for the Third Circuit.

3. On or about September 5, 2017, my office spoke with counsel for Plaintiffs who consented to the admission *pro hac vice* of Eric C. Bosset, Esq., Simon J. Frankel, Esq. and Megan L. Rodgers, Esq. in this matter.

4. If the Court grants SEA’s application for the admission *pro hac vice* of Eric C. Bosset, Esq., Simon J. Frankel, Esq. and Megan L. Rodgers, Esq., I or another member of Gibbons P.C. who is a member in good standing of the bars of the State of New Jersey and the United States District Court for the District of New Jersey will continue to serve as counsel of record in this matter, will review and sign all pleadings, briefs, and other papers filed with the Court, will be present for all appearances before the Court unless previously excused from appearing by the Court, will be responsible for the conduct of this action and for the conduct of Eric C. Bosset, Esq., Simon J. Frankel, Esq. and Megan L. Rodgers, Esq. and will otherwise comply with all the terms and conditions of Local Civil Rule 101.1(c).

5. For the foregoing reasons and those set forth in the Declarations of Eric C. Bosset, Esq., Simon J. Frankel, Esq. and Megan L. Rodgers, Esq. submitted herewith, it is respectfully requested that the Court execute and direct the entry of the attached Order admitting Eric C.

Bosset, Esq., Simon J. Frankel, Esq. and Megan L. Rodgers, Esq. *pro hac vice* for the purpose of representing SEA in this litigation.

I declare under penalty of perjury that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

Dated: September 6, 2017

By: s/ Michael R. McDonald
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